

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

ABIGAIL MULLEN,	)	Civil Action No. 2:20-cv-02020
	)	
Plaintiff,	)	Honorable J. Nicholas Ranjan
	)	
v.	)	
	)	<i>ELECTRONICALLY FILED</i>
MSA SAFETY PITTSBURGH	)	
MANUFACTURING, LLC,	)	
	)	JURY TRIAL DEMANDED
Defendant.	)	

**DEFENDANT’S RESPONSE TO PLAINTIFF’S  
MOTION FOR LEAVE TO AMEND COMPLAINT**

Defendant, MSA Safety Pittsburgh Manufacturing, LLC, files this Response to Plaintiff’s Motion for Leave to Amend Complaint and sets forth the basis for its position here:

1. Plaintiff’s counsel first sought consent for permission to file an Amended Complaint on August 19, 2021 not August 6, 2021 as indicated in the Certificate of Service. Doc. No. 28.
2. Before counsel could respond, Plaintiff filed the instant Motion.
3. Defendant does not object to the relief requested in Plaintiff’s Motion.
4. However, the filing of the Second Amended Complaint should not affect the current September 1, 2021 discovery deadline, which was the subject to a Motion by Plaintiff already denied by this Court. See Doc. No. 26.

Dated: August 25, 2021

Respectfully submitted,

JACKSON LEWIS P.C.

/s/ Laura C. Bunting

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